

MICHAEL J. IOANNOU (SBN 95208)  
 KEVIN W. ISAACSON (SBN 281067)  
 PAULA B. NYSTROM (SBN 329651)  
 AMANDA M. OGATA (SBN 354967)  
 ROPERS MAJESKI PC  
 333 W. Santa Clara St., Suite 930  
 San Jose, CA 95113  
 Telephone: 408.287.6262  
 Facsimile: 408.918.4501  
 Email: michael.ioannou@ropers.com  
 kevin.isaacson@ropers.com  
 paula.nystrom@ropers.com  
 amanda.ogata@ropers.com

Attorneys for Defendants and Counterclaimants  
 ANALOG DEVICES, INC. and  
 MAXIM INTEGRATED PRODUCTS, INC.

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION

NUMBER 14 B.V.,  
  
 Plaintiff,  
  
 v.  
  
 ANALOG DEVICES, INC.; and MAXIM  
 INTEGRATED PRODUCTS, INC.  
  
 Defendants.  


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 ANALOG DEVICES, INC.; and MAXIM  
 INTEGRATED PRODUCTS, INC.,  
  
 Counterclaimants,  
  
 v.  
  
 NUMBER 14 B.V.,  
  
 Counter-Defendant.

Case No.: 5:24-cv-02435-EKL

**STIPULATION AND ORDER RE:  
 FIRST REQUEST TO CONTINUE  
 DEADLINE OF DEFENDANTS'  
 DOCUMENT PRODUCTION  
 FROM SEARCH TERMS**

Plaintiff/Counter-Defendant NUMBER 14 B.V. (“Plaintiff” or “Counter-Defendant”) and Defendants/Counterclaimants ANALOG DEVICES, INC. and MAXIM INTEGRATED PRODUCTS, INC. (collectively, “Defendants” or “Counterclaimants”), by and through their respective attorneys of record, hereby stipulate and respectfully request that the Court modify the Discovery Letter Brief Order (ECF 114) to continue the deadline for Defendants’ document production from search terms by 18 days, from April 4, 2025 to April 22, 2025, pursuant to Civil Local Rules 6-1 and 6-2.

WHEREAS, pursuant to the Court’s Discovery Letter Brief Order (ECF 114) the deadline for Defendants to complete their document production from search terms is April 4, 2025.

WHEREAS, Defendants submit that good cause exists to extend this deadline to April 22, 2025 as the parties only recently finalized the list of search terms that will be used for this document review and production after conferring pursuant to the Court’s Stipulated Order Re: Discovery of Electronically Stored Information for Standard Litigation. (ECF 88) Agreement on the parties’ current list was reached on Wednesday, March 26, 2025.<sup>1</sup> With the current agreed-upon list of search terms, there are over 34,000 documents that have search term hits, including over 75,000 documents within the families of those with search hits. Given the volume of documents involved, additional time is necessary to ensure proper review and production, and to prevent any undue delays in the process.

WHEREAS, extending the deadline for Defendants to complete their document production based on search terms from April 4, 2025, to April 22, 2025 will not affect the rest of the case schedule. The next scheduled event is the filing of a joint discovery status update by April 11, 2025. *See* ECF 114. Although Defendants will not have completed document production based on search terms by that date, the parties will be able to provide the Court with an update on the status of the remaining document production.

WHEREAS, the parties have not previously requested a modification of the Court’s deadline for Defendants to complete their document production based on search terms. Other time

<sup>1</sup> This agreement is subject to a reservation for further modification by Plaintiff. If the list of search terms and/or custodians is amended, Defendants believe additional time will be needed for review and production of the additional documents.

modifications unrelated to the Discovery Letter Brief Order include the following:

Date	Event Description	ECF Filing
May 28, 2024	The parties stipulated to an extension of time for Defendants to respond to Plaintiff's Complaint.	ECF 17
June 18, 2024	This Court granted an extension of time for Plaintiff to respond to Defendants' Administrative Motion to File Under Seal.	ECF 27
July 2, 2024	This Court granted an extension of time for Plaintiff to respond to Defendants' Answer to Plaintiff's Complaint with Affirmative Defenses and Counterclaims.	ECF 39
August 2, 2024	This Court granted an extension of time for Defendants/Counterclaimants to file their response to Plaintiff's Motion to Dismiss.	ECF 49
August 22, 2024	This Court granted an extension of time to Counter-Defendants to reply to Defendants' Opposition to Plaintiff and Counter-Defendants' Motion to Dismiss.	ECF 59
December 19, 2024; March 31, 2025	This Court granted an extension of time for the deadline to amend pleadings or add parties. The Court further extended the deadline in the Court's Order for Plaintiff and Counter-Defendants' Motion to Dismiss.	ECF 85; ECF 118

THEREFORE, the parties, by and through their respective attorneys of record, hereby stipulate and respectfully request that the Court modify the Discovery Letter Brief Order (ECF 114) to extend Defendants' deadline to complete document production based on search terms by 18 days, from April 4, 2025, to April 22, 2025, in accordance with Civil Local Rules 6-1 and 6-2.

The Declaration of Kevin W. Isaacson in support of this Stipulation to Extend Time is filed concurrently herewith.

Dated: April 3, 2025

MEUNIER CARLIN & CURFMAN LLC

By: */s/ Warren J. Thomas*

WARREN J. THOMAS  
Attorneys for Plaintiff and Counter-  
Defendant NUMBER 14 B.V.

1 Dated: April 3, 2025

ROPERS MAJESKI PC

3 By: /s/ Kevin W. Isaacson

4 MICHAEL J. IOANNOU

5 KEVIN W. ISAACSON

6 PAULA B. NYSTROM

7 AMANDA M. OGATA

8 Attorneys for Defendants and Counter-  
9 Claimants ANALOG DEVICES, INC. and  
10 MAXIM INTEGRATED PRODUCTS,  
11 INC.

12 **ATTESTATION PURSUANT TO LOCAL RULE 5-1 (i)(3)**

13 The undersigned attests pursuant to Local Rule 5-1(i)(3) that concurrence in the filing of  
14 this document has been obtained from the other signatory hereto.

15 Dated: April 3, 2025

/s/ Kevin W. Isaacson

Kevin W. Isaacson

ROPERS  
A Professional Corporation  
San Jose

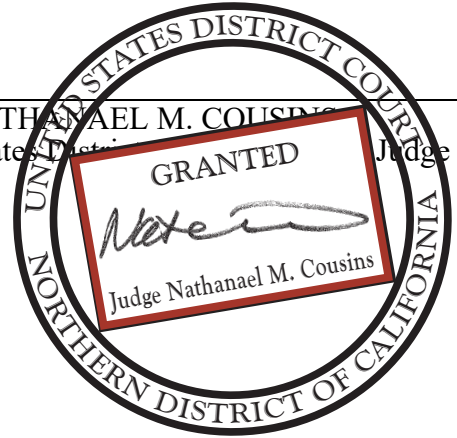
MAJESKI

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED that the deadline for Defendants to complete their document production based on search terms is continued from April 4, 2025, to April 22, 2025.

Dated: April 3, 2025

HON. NATHANAEAL M. COUSINS  
United States District Judge



ROPERS  
MAJESKI  
A Professional Corporation  
San Jose

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Plaintiff,

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ANALOG DEVICES, INC.; and MAXIM  
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NUMBER 14 B.V.,

Counter-Defendant.

Case No.: 5:24-cv-02435-EKL

**DECLARATION OF KEVIN W.  
 ISAACSON IN SUPPORT OF  
 STIPULATION RE: FIRST REQUEST  
 TO CONTINUE DEADLINE OF  
 DEFENDANTS' DOCUMENT  
 PRODUCTION FROM SEARCH  
 TERMS**

1 I, Kevin W. Isaacson, declare as follows:

2 1. I am an attorney admitted to practice before the courts of the State of California. I  
 3 am a partner with the law firm of Ropers Majeski PC (“Ropers”), counsel of record for  
 4 Defendants/Counterclaimants ANALOG DEVICES, INC. and MAXIM INTEGRATED  
 5 PRODUCTS INC. (collectively, “Defendants” or “Counterclaimants”) in the above-captioned  
 6 matter. I have personal knowledge of the facts set forth herein, and if called as a witness, could  
 7 and would testify competently hereto.

8 2. On February 11, 2025, the parties filed a Joint Discovery Letter Brief in  
 9 accordance with the Court’s Standing Order, addressing a dispute regarding Defendants’  
 10 document production in response to Plaintiff’s First and Second Requests for Production of  
 11 Documents, as well as compliance with discovery obligations under the ESI Order. ECF 104.

12 3. On March 6, 2025, the parties filed a status report regarding the Joint Discovery  
 13 Letter Brief at the Court’s request. ECF 113; *see* ECF 107. On the same day, the Court issued its  
 14 Order granting in part and denying in part the Joint Discovery Letter Brief. ECF 114.

15 4. Pursuant to the Discovery Letter Brief Order (ECF 114), the deadline for  
 16 Defendants to complete document production based on search terms is April 4, 2025.

17 5. The parties have stipulated to an extension of the deadline for Defendants to  
 18 complete document production based on search terms from April 4, 2025, to April 22, 2025.

19 6. Defendants submit good cause exists as the parties only recently finalized the list  
 20 of search terms that will be used for this document review and production after conferring  
 21 pursuant to the Court’s Stipulated Order Re: Discovery of Electronically Stored Information for  
 22 Standard Litigation. ECF 88.

23 7. The parties agreed on the current list of search terms on Wednesday, March 26,  
 24 2025. This agreement is subject to the reservation for further modification by Plaintiff. If the list  
 25 of search terms and/or custodians is amended, additional time will be needed for review and  
 26 production of the additional documents.

27 8. Based on the current agreed-upon list of search terms, there are over 34,000  
 28 documents that have search term hits and over 75,000 documents with families of those with

1 search hits. Given the volume of documents involved, additional time is necessary to ensure  
2 proper review and production.

3 9. Extending the deadline for Defendants to complete their document production  
4 based on search terms from April 4, 2025, to April 22, 2025 does not impact the rest of the  
5 schedule of the case.

6 10. The next scheduled event is the filing of a joint discovery status update by  
7 April 11, 2025. *See* ECF 114. The parties will still be able to provide the Court with an update on  
8 the status of the remaining document production.

9 11. The parties have not previously requested a modification of the Court's deadline  
10 for Defendants to complete their document production based on search terms.

11 12. Previously and unrelated to this stipulation and the Court's Joint Discovery Letter  
12 Order, including the deadline for Defendants to complete their document production based on  
13 search terms, other time modifications include the following:

- 14 a. On May 28, 2024, the parties stipulated to an extension of time for Defendants to  
15 respond to Plaintiff's Complaint (ECF 17);
- 16 b. On June 18, 2024, the Court granted an extension of time for Plaintiff to respond  
17 to Defendants' Administrative Motion to File Under Seal (ECF 27);
- 18 c. On July 2, 2024, the Court granted an extension of time for Plaintiff to respond to  
19 Defendants' Answer to Plaintiff's Complaint with Affirmative Defenses and  
20 Counterclaims (ECF 39);
- 21 d. On August 2, 2024, the Court granted an extension of time for  
22 Defendants/Counterclaimants to file their response to Plaintiff's Motion to  
23 Dismiss (ECF 49);
- 24 e. On August 22, 2024, the Court granted an extension of time to Counter-  
25 Defendants to reply to Defendants' Opposition to Plaintiff and Counter-  
26 Defendants' Motion to Dismiss (ECF 59);
- 27 f. On December 19, 2024 the Court continued the deadline to amend pleadings or  
28 add parties (without leave of court) (ECF 85), and further amended this deadline



1 on March 31, 2025 in its Order regarding Plaintiff and Counter-Defendants'  
2 Motion to Dismiss (ECF 118).

3 I declare under penalty of perjury under the laws of the United States of America that the  
4 foregoing is true and correct.

5 Executed this 3rd day of April, 2025 at San Jose, California.

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7 By: /s/ Kevin W. Isaacson  
Kevin W. Isaacson

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